



CALIFORNIA FARM BUREAU FEDERATION

DEPARTMENT OF ENVIRONMENTAL ADVOCACY
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MEMORANDUM

TO: STEIN BUER, CAL-FED PROGRAM MANAGER

FROM: DAVID J. GUY

DATE: August 26, 1998

RE: August 5, 1998 "Developing a Draft Preferred Program Alternative"

We have reviewed the Cal-Fed August 5, 1998 "Developing a Draft Preferred Program Alternative." These comments will either reiterate or supplement the comments that we have previously provided to you at several BDAC meetings and in our July 8, 1998 memorandum.

1. Common Programs Have Not Been Subject to Proper Scrutiny

Cal-Fed still seems to suggest that the common programs are not controversial. (See p. 11.) This is not the case. You can be sure that there is significant controversy on the common programs--the only broad agreement is that these types of programs should be considered as part of the Cal-Fed solution. We encourage you to make it clear up front that there is not broad agreement on the details (i.e., magnitude, scope, and location) of the numerous components of the common programs, any more than there is general agreement on the details of the storage component.

2. Storage as a Common Program

Storage must be a common program in Cal-Fed. As previously discussed, there is no difference between the storage and any of the other common programs--they are all critical parts of the Cal-Fed program in which the details will need to be developed over the next several years.

3. Need to Protect Landowners' Water Rights

The protection of landowners' water rights continues to be ignored in the Cal-Fed process. Like the water bond discussions, we will continue to make the protection of landowner water rights a high priority. The bottom line is that landowners' surface and groundwater rights must be protected up front before any project, including any conjunctive use or other groundwater storage project, is approved or implemented. For this document, we urge you to be consistent and state the water right protections up front in the conjunctive use section the way that you have done so in the water transfer discussion (see p. 24).

4. Consider Population

There continues to be no reference to population in the draft document. We believe that there should be a reference to population projections in the preface of the document to put the program in perspective. If Cal-Fed is going to be central to California water planning for the next 30 years, there has to be a recognition that there will be significantly more people in California at the end of that planning horizon and that Cal-Fed has no choice but to consider this in its decision-making process.

5. Stage 1 Implementation

The draft contains several points that are listed for Cal-Fed to succeed with respect to Stage 1. (See p. 10.) The first component is that there must be improvement for all resource areas. Although this is important, these must also be improvement for all geographic areas. Otherwise, as a practical matter, there will be little interest in certain parts of the state to move forward in this process, which will make success difficult if not impossible.

Also, with respect to Stage 1, Cal-Fed must improve conditions in the Bay Delta for listed and proposed species, while providing assurances to both water users and landowners that they will continue the use of their land and water. Although this will be addressed in part before Stage 1, there is no question that this will be a critical part of Stage 1 implementation.

As before, we find this document to be an excellent window for people to view the Cal-Fed process and would encourage further updates that reflect these suggestions.

DJG:mo
cc: Lester Snow
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